

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
: :  
SEARS HOLDING CORPORATION, *et al.*, : Case No. 18-23538 (RDD)  
: :  
: (Jointly Administered)  
: :  
Debtors.<sup>1</sup> :  
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**NOTICE OF APPEARANCE  
AND REQUEST FOR DOCUMENTS**

**PLEASE TAKE NOTICE** that Steven Bruce as Trustee of the STEVEN BRUCE REVOCABLE TRUST, Cara Bruce and Lou Cuida as Trustees of the CARA BRUCE IRREVOCABLE TRUST, and Allison Bruce and Lou Cuida as Trustees of the ALLISON BRUCE IRREVOCABLE TRUST (collectively, the “Bruce Trusts”) by and through their undersigned counsel, hereby appear in the above-captioned case. Pursuant to Section 342 and 1109(b) of the United States Bankruptcy Code and Rules 2002, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, the Bruce Trusts request that all notices given, and all papers served on

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

any party in these jointly administered cases be delivered to, and served upon, their counsel at the following addresses:

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**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes notices of papers referred to in the Federal Rules of Bankruptcy Procedure, the Bankruptcy Code, and also includes, without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests for petition, answering or reply paper, memoranda or briefs in support of the foregoing, and other documents brought before the court with respect to the above-captioned cases.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request for Documents shall not be deemed to be a waiver of the Bruce Trusts' rights (1) to have final orders in non-core matters entered only after de novo review by a District Court Judge, (2) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) to any other rights, claims, actions, setoffs, or recoupments to which the Bruce Trusts are or may be entitled, in law or in equity, all of which rights, claims, actions,

setoffs, and recoupments the Bruce Trusts expressly reserve, or (5) to any and all defenses or objections the Bruce Trusts may have to any claims asserted against them in these cases or any related action including, without limitation, any defense based on insufficient service of process, jurisdiction (including personal jurisdiction), or capacity to be sued.

Dated: May 10, 2019  
New York, New York

TROUTMAN SANDERS LLP

By: /s/ Brett D. Goodman

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*Attorneys for the Bruce Trusts*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10<sup>th</sup> day of May, 2019, I caused a true and correct copy of the foregoing *Notice of Appearance and Request for Documents* to be filed electronically. Notice of this filing will be sent by operation of the Court's CM/ECF Electronic Filing System to all parties on the CM/ECF Electronic Mail Notice List.

Dated: May 10, 2019  
New York, New York

TROUTMAN SANDERS LLP

By: /s/ Brett D. Goodman

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